BASF
We create chemistry

April 29, 2020

Sent by Certified Mail
Director, Air and Radiation Division
U.S. EPA Region V
77 West Jackson Blvd.
Chicago, IL 60604-3507

Subject: BASF Corporation, Elyria, Ohio
Annual Title V Compliance Certification Report

Dear Sir / Madam:

BASF Corporation hereby submits the annual Title V compliance report for the period January 1, 2019 to December 31, 2019, as required by Part A.13.d of the site's Title V Permit.

Based on available information and belief formed after reasonable inquiry, the undersigned certifies that the statements and information in this report are true, accurate, and complete. Please contact Nancy Gallagher at (440) 329-2427 if you have any questions concerning this report submittal.

Sincerely yours,

Leon Zavodnik

Leon Zavodnik
Operations Manager, BASF Elyria

Enclosures

BASF Corporation
120 Pine Street
Elyria, Ohio 44035-5228 USA

SECTION I
GENERAL INFORMATION

A. Print or type the following information for each facility for which you are submitting an excess emissions and CMS performance report and/or summary report (§63.9(b)(2)(i)-(ii))

Operating Permit Number (OPTIONAL)	Facility I.D. Number (OPTIONAL)
P0125035	0247040195

Responsible Official's Name/Title

Kathy Milstid-Fisette

Street Address

120 Pine Street

City	State	ZIP Code
Elyria	OH	44035

Facility Name (if different from Responsible Official's Name)

BASF Corporation

Facility Street Address (If different than Responsible Official's Street Address)

Facility Local Contact Name	Title	Phone (OPTIONAL)

City	State	ZIP Code

B. Indicate the relevant standard(s) or other requirement(s) that is/are the basis for this report. (§63.5(d)(1)(ii)(D))

Basis for this report *(relevant standards or other requirements)*

40 CFR 60.7 and 60.16(h)

C. Are you requesting a waiver of recordkeeping and/or reporting requirements under the applicable relevant standard(s) in conjunction with this excess emissions and CMS performance report and/or summary report? (§63.10(f)(3))

☐ Yes X No

If you answered yes, you must submit the application for a waiver of recordkeeping and/or reporting requirements together with this excess emissions and CMS performance report and/or summary report. The application for waiver should include whatever information you consider useful to convince the Administrator that a waiver of recordkeeping and/or reporting is warranted. (§63.10(f)(3))

D. Check the box that corresponds to the report(s) you are submitting:

☐ Summary Report Only ***(Complete Sections II and IV)***

X Excess Emission and CMS Performance Report and Summary Report ***(Complete Sections II, III, and IV)***

SECTION II
CERTIFICATION *(Note: you may edit the text in this section as deemed appropriate)*

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Name of Responsible Official (Print or Type)	Title	Date (mm/dd/yy)
Leon Zavodnik	Operations Manager	04/29/2020

Signature of Responsible Official

Leon Zavodnik

SECTION III
EXCESS EMISSIONS AND CMS PERFORMANCE REPORT

A. Excess Emissions

1. Have any excess emissions or exceedances of a parameter occurred during this reporting period? _ Yes X **No** ***(if no, go to B.1.)*** (§63.10(e)(3)(v))

2. If you answered yes, complete the following table ***for each period*** of excess emissions and/or parameter monitoring exceedances, as defined in the relevant standard(s), that occurred ***during*** startups, shutdowns, and/or malfunctions of your affected source, ***or during periods other than*** startups, shutdowns, and/or malfunctions of your affected source. (§63.10(c)(7)-(11))

Note: Use a separate line for each period of excess emissions and/or parameter monitoring exceedances of your affected source.

Nature of Event or Problem		Excess Emissions and/or Parameter Monitoring Exceedances Occurred:							
Excess Emissions	Parameter Monitoring Exceedance	During Startup	During Shutdown	During Malfunction	During Another Period	Start Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	Nature and Cause of any Malfunction (if known)	Corrective Action Taken or Preventive Measures Adopted
None									

B. CMS Performance

1. Has a CMS been inoperative (except for zero/low-level and high-level checks), out of control (as defined in §63.8(c)(7)(i)), repaired, or adjusted during this reporting period? ☒ Yes ☐ No ***(if no, go to B.3.)*** (§63.10(e)(3)(v))

Note: A CMS is out of control if (a) the zero (low-level), mid-level (if applicable), or high-level calibration drift (CD) exceeds two times the applicable CD specification in the applicable performance specification or in the relevant standard; or (b) the CMS fails a performance test audit (e.g., cylinder gas audit), relative accuracy audit, relative accuracy test audit, or linearity test audit; or (c) the COMMS CD exceeds two times the limit in the applicable performance specification in the relevant standard. (§63.8(c)(7(i))

When the CMS is out of control, the owner or operator of the affected source shall take the necessary corrective action and shall repeat all necessary tests which indicate that the system is out-of-control. The owner or operator shall take corrective action and conduct retesting until the performance requirements are below the applicable limits. The beginning of the out-of-control period is the hour the owner or operator conducts a performance check (e.g., calibration drift) that indicates an exceedance of the performance requirements established under this part. The end of the out-of-control period is the hour following the completion of corrective action and successful demonstration that the system is within the allowable limits. During the period the CMS is out-of-control, recorded data shall not be used in data averages and calculations, or to meet any data availability requirement established under this part. (§63.8(c)(7(ii))

2. If you answered yes, complete the following table ***for each period*** a CMS was out of control, repaired, or adjusted: (§63.10(c)(5)-(6), (10)-(12); §63.8(c)(8))

Note: Use a separate line for each period a CMS was out of control, repaired, or adjusted.

CMS Type	Manufacturer	Process ID Number	Start Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	Nature and Cause of Any Malfunction (if known)	Corrective Action Taken or Preventive Measures Adopted	Nature of the Repairs or Adjustments Made to the CMS that was Inoperative or Out of Control
GP-IR	Rosemount Analytical	P102, P103, P009, P092	01/16/2020	01/16/2020	Respond to results of daily calibration failure	Shut down all sources	Replace empty gas cylinder
GP-IR	Rosemount Analytical	P102, P103, P009, P092	01/28/2020	01/28/2020	Respond to results of daily calibration failure, general system maintenance and optimization	No sources operating at the time	Adjust and recalibrate analyzer

3. Indicate the total process operating time during the reporting period. (§63.10(c)(13))

Total process operating time (days)
78 days

SECTION IV
SUMMARY REPORT- GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

Note: One summary report shall be submitted for the hazardous air pollutants monitored at each affected source (unless the relevant standard specifies that more than one summary report is required, e.g., one summary report for each hazardous air pollutant monitored). (§63.10(e)(3)(vi))

A. Report Date and Submittal Reporting Period

Indicate the reporting period covered by this submittal and the date of this summary report. (§63.10(e)(3)(vi)(C), (M))

Reporting period beginning date (mm/dd/yyyy)	Reporting period ending date (mm/dd/yyyy)	Summary report date (mm/dd/yyyy)
01/01/2020	03/31/2020	

B. Process Description and Monitoring Equipment Information

Complete the following process description and monitoring equipment information table ***for each affected source process unit***: (§63.10(e)(3)(vi)(B), (D), (E), (F), (G), (H))

Total operating time of affected source during the reporting period (Hours)
1864 hours

Process unit name
Rotary Calciners #2, #3, #4, #6

Process unit description
Rotary calciners for metals-based catalyst production.

Emission and/or operating parameter limitations specified in the relevant standard(s)
200 ppmvd

Monitoring Equipment Information

Type	Latest Certification or Audit Date (mm/dd/yyyy)	Manufacturer	Model	HAPs Monitored
GP-IR	02/13/2020	Rosemount Analytical	X-Stream	NOx

C. Emission Data Summary

Complete the following emission data summary table ***for each affected source***: (§63.10(e)(3)(vi)(I))

Total duration of excess emissions/parameter exceedances (minutes for opacity, hours for gases): NA

Opacity (minutes): 0	Gases (hours): 0

Total operating time of affected source during the reporting period (days)

78 days

Percent of total source operating time during which excess emissions/parameter exceedances occurred (percent)

0

Summary of causes of excess emissions/parameter exceedances (percent of total duration by cause)

Startup/shutdown	0%
Control equipment problems	0%
Process problems	0%
Other known causes	0%
Other unknown causes	0%
TOTAL	0%
Total NOx Emissions for the Quarter (tons)	0.157

No excess emissions or opacity for P009, P092, P102, P103

D. CMS Performance Summary

Complete the following CMS performance summary table ***for each affected source***: (§63.10(e)(3)(vi)(J))

Total duration of CMS downtime (minutes for opacity, hours for gases): P009, P092, P102, P103

Opacity (minutes): 0	Gases (hours): 0

Total operating time of affected source during the reporting period (days)

78 days

Percent of total source operating time during which CMS were down (percent)

0

Summary of causes of CMS downtime (percent of downtime by cause)

Monitoring equipment malfunctions	0%
Non-monitoring equipment malfunctions	0%
Quality assurance/quality control calibrations	100%
Other known causes	0%
Other unknown causes	0%
TOTAL	100%

When CMS is down, sources do not operate. Sources were down for non-CMS-related reasons.

E. CMS, Process, or Control Changes

1. Have you made any changes in CMS, processes, or controls since the last reporting period? ☐ Yes ☒ No ***(if no, end of form)*** (§63.10(e)(3)(vi)(K))

2. If you answered yes, please describe the changes below:

Changes in CMS, processes, or controls since the last reporting period

END OF FORM - Please make sure that a Responsible Official signs Section II prior to submitting the form to your EPA Regional Office or your State Air Permitting Agency, as applicable.

TV Annual Compliance Certification 202700
BASF Corporation
0247040195
April 24, 2020

Ohio EPA, Division of Air Pollution Control

Title V Annual Compliance Certification

Facility ID: 0247040195
Facility Name BASF Corporation
Submitted: No

Report ID 202700
Report Type TV Annual Compliance Certification
Report Status Draft

Reporting Period 2019

1. **Identification of Intermittent Compliance (IC)**

Intermittent compliance may be identified through either the following table or by attaching the information below. When attaching a document in lieu of using the table below, the document must meet the required format and content requirements for annual certifications. You can download a 'Title V Compliance Certification' form that meets these requirements along with instructions and examples from the system's Reference Page. Except as indicated in this section, the Material Information Section below, or any attachments submitted in lieu of using this sections, submittal of this report shall indicate all emissions units subject to one or more applicable requirements operated in continuous compliance with all federally enforceable permit terms and conditions throughout the reporting period identified above.

				Excursions/Deviations (one of the following must be provided)	
IC ID	EU ID	Emission Limitation/Control Measure or Permit Term No.	Compliance Method	Report Date of Those Documented Within Excursion/Deviation Reports Submitted to DO/LAA	Explain the Date, Nature, Duration, and Probable Cause of the Excursion/Deviation, as well as any Corrective Action Taken
72941	P009 and P103	Conditions C.2.b.1.g and C.14.b.1.g	Visual inspection	Jul 31, 2019	
72800	P026	Condition A.20	Obtain trial exemption and modify PTI	Jul 31, 2019	
72801	P009, P102, and P103	Conditions C.2.b.1.g, C.13.b.1.g, and C.14.b.1.g	Visual inspection	Jul 31, 2019	
72802	P026	Condition C.5.b.2.c	Visual inspection	Jul 31, 2019	
72805	P006	Condition C.1.b.1.f	Visual Inspection	Oct 31, 2019	
72806	P006	Condition C.1.b.1.f (renamed Condition	Visual Inspection	Jan 31, 2020	

		C.1.2.1.f in the APA Title V Permit issued 10/29/2019)			
72807	P009	Condition C.2.4.10	For calciners P009, P010, P080, P092, P102 and P103 when in NOx service using the SCR system, the permittee shall operate and maintain equipment to continuously monitor and record NOx emissions from this emissions unit in units of the applicable standard(s).	Jan 31, 2020	
72735	P095	Condition C.11.b.1.f	Visual inspection	Apr 29, 2019	

2. **Any Material Information Not Established Through the Applicable Permit Terms and Conditions That May Indicate Non-Compliance**

For each peice of material information, identify the emissions unit or briefly describe the requirement and then provide a description of the material information. For insignificant emissions units, include the permit number or SIP-based applicable requirement rule reference. If you are attaching a Title V Compliance Certification form that includes this information you do not need to duplicate it here.

3. **Attachments**

If you are attaching any previously submitted reports as part of this submittal, remember to also report the name and the date of the report.

Attachment ID	Attachment Type	Description	Public Document	Trade Seceret Document	Trade secret Justification	Event Date
1980188	Title V Compliance Certification attachments	2019 Wonderware Potential Deviations	X			

Potential Deviations for **January 31, 2019 to March 31, 2019** reporting in accordance with the following instructions.

Please note that the Elyria site recently entered into a consent agreement with EPA Region V that requires it to convert its additional operations management software into a real-time environmental monitoring and recordkeeping system. As part of this transition, the site has begun to gather and review data that reflects certain Title V permit parameters, but because the transition is not yet complete, the site cannot yet determine whether any deviations recorded in this system reflect violations of permit terms or are attributable to some other cause. Until the new system is in place, EPA Region V advised us to submit this information as follows:

"Under its Title V permit BASF must report violations, which means determining whether indicated potential violations are actual violations. EPA's acceptance of BASF's proposed Environmental Management System (EMS) to resolve BASF's ongoing compliance issues through the Administrative Consent Order (ACO) in this matter requires this functionality. See ACO, paragraph 44. BASF has up to 12 months from the ACO's effective date to demonstrate compliance with the CAA and relevant permits. Ibid. Until BASF's EMS has this functionality, BASF should therefore continue to base its Title V reports on the observations and paper records required by the Title V permit. But in the interim, BASF should also include and appropriately label in its Title V reports potential deviations appearing in the Wonderware data."

Pursuant to EPA's instructions, we are basing our Title V reports on the paper records required by the Title V permit, but we are also including deviations reflected in the Wonderware data, labeled as "potential deviations."

Unit ID	Source	Air Pollution Control Device	Monitoring Requirements	Potential Deviations
P009	Rotary Calciner #4 (E-13-1)	Calciner 4A Dust Collector	Baghouse Pressure drop (0.1-5"WC)	3
P009	Rotary Calciner #4 (E-13-1)	Calciner 4B Dust Collector	Baghouse Pressure drop (0.1-5"WC)	30
P010	Rotary Calciner #1 (E-14)	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	2
P018	Wyssmont Drier (E-22)	Baghouse	Baghouse pressure drop (1-7"WC)	4
P026	Double Cone Blender B-1&2 (E-30)	Dust Collector #8	Baghouse Pressure drop (0.1-5"WC)	4
P092	Rotary Calciner #6	Dust Collector #6	Pressure drop (0.1-5"WC)	6
P092	Rotary Calciner #6	Sly Scrubber	Flow > 2 gpm AND Demister Pressure Drop (0.05-1"WC)	18
P099	PK Blender #2 (E-103)	Bldg. 9 Scrubber	Pressure Drop (>2"WC) AND Water Flow (>2 gpm)	1
P103	Rotary Calciner #3	Dust Collector #3	Baghouse Pressure drop (0.1-5"WC)	3
P103	Rotary Calciner #3	Dust Collector #8	Baghouse Pressure drop (0.1-5"WC)	11
P106	National Dryer	National Dust Collector	Baghouse Pressure drop (0.1-5"WC)	9
P121	P&S Dryer #2	Dust Collector #2	Baghouse pressure drop (0.1-5"WC)	3
P122	P&S Dryer #3	Dust Collector #3	Baghouse pressure drop (0.1-5"WC)	3
P130	#6 P&S Dryer	Sly Scrubber	Flow > 2 gpm AND Demister Pressure Drop (0.05-1"WC)	15
TriMer	Trimer Scrubber	TriMer 1st Stage Pressure Drop	Pressure Drop (0.05-3"WC)	16
TriMer	Trimer Scrubber	TriMer 2nd Stage Pressure Drop	Pressure Drop (0.2-5"WC)	3
TriMer	Trimer Scrubber	TriMer 3rd Stage Pressure Drop	Pressure Drop (0.2-6"WC)	1

TriMer	Trimer Scrubber	Trimer Stage #1 Recircualtion Flow	Flow >50 gpm	6
TriMer	Trimer Scrubber	Trimer Stage #2 Recircualtion Flow	Flow >50 gpm	1
TriMer	Trimer Scrubber	Trimer Stage #3 Recircualtion Flow	Flow >50 gpm	4
TriMer	Trimer Scrubber	Trimer Stage #1 pH	pH >9	3
TriMer	Trimer Scrubber	Trimer Stage #2 pH	pH >9	1
TriMer	Trimer Scrubber	Trimer Stage #3 pH	pH >9	1

Potential Deviations for **April 1, 2019 to June 30, 2019** reporting in accordance with the following instructions.

Please note that the Elyria site recently entered into a consent agreement with EPA Region V that requires it to convert its additional operations management software into a real-time environmental monitoring and recordkeeping system. As part of this transition, the site has begun to gather and review data that reflects certain Title V permit parameters, but because the transition is not yet complete, the site cannot yet determine whether any deviations recorded in this system reflect violations of permit terms or are attributable to some other cause. Until the new system is in place, EPA Region V advised us to submit this information as follows:

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Pursuant to EPA's instructions, we are basing our Title V reports on the paper records required by the Title V permit, but we are also including deviations reflected in the Wonderware data, labeled as "potential deviations."

Unit ID	Source	Air Pollution Control Device	Monitoring Requirements	Potential Deviations
P006	Copper Calciner 1 (E-10)	Main Draft Dust Collector	Pressure drop (0.1-5" WC)	6
P006	Copper Calciner 1 (E-10)	Packaging Dust Collector	Pressure drop (0.1-5" WC)	2
P010	Rotary Calciner #1 (E-14)	Dust Collector #1	Baghouse Pressure drop (0.1-5"WC)	3
P010	Rotary Calciner #1 (E-14)	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	7
P018	Wyssmont Drier (E-22)	Baghouse	Baghouse pressure drop (2-7"WC)	9
P080	Rotary Calciner #5 (E-13)	Dust Collector 5A	Pressure drop (0.1-5"WC)	6
P086	Gen Cat P&S Dryer #1	Dust Collector #1	Pressure drop (0.1-5"WC)	1
P092	Rotary Calciner #6	Dust Collector #6	Pressure drop (0.1-5"WC)	7
P092	Rotary Calciner #6	Sly Scrubber	Flow > 2 gpm AND Demister Pressure Drop (0.05-1"WC)	7
P095	Copper Calciner #2 (E-101)	Main Draft Dust Collector	Baghouse Pressure Drop (0.1-6"WC)	10
P102	Rotary Calciner #2	Dust Collector #2	Baghouse Pressure drop (0.1-5"WC)	2
P102	Rotary Calciner #2	Dust Collector #8	Baghouse Pressure drop (0.1-5"WC)	7
P102	Rotary Calciner #2	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	2
P103	Rotary Calciner #3	Dust Collector #3	Baghouse Pressure drop (0.1-5"WC)	1
P103	Rotary Calciner #3	Dust Collector #8	Baghouse Pressure drop (0.1-5"WC)	10
P106	National Dryer	National Dust Collector	Baghouse Pressure drop (0.1-5"WC)	9
P121	P&S Dryer #2	Dust Collector #2	Baghouse pressure drop (0.1-5"WC)	2

P122	P&S Dryer #3	Dust Collector #3	Baghouse pressure drop (0.1-5"WC)	1
TriMer	Trimer Scrubber	TriMer 1st Stage Pressure Drop	Pressure Drop (0.05-3"WC)	5
TriMer	Trimer Scrubber	Trimer Stage #1 Recircualtion Flow	Flow >50 gpm	2
TriMer	Trimer Scrubber	Trimer Stage #2 Recircualtion Flow	Flow >50 gpm	1
TriMer	Trimer Scrubber	Trimer Stage #3 Recircualtion Flow	Flow >50 gpm	9
TriMer	Trimer Scrubber	Trimer Stage #3 pH	pH >9	2
Viron 2	Viron Scrubber 2	Pressure Drop Across Scrubber	Pressure Drop (0.5-12"WC)	1
Viron 2	Viron Scrubber 2	Scrubber Pump Flow East	Flow > 2 gpm	1
Viron 2	Viron Scrubber 2	Scrubber Pump Flow West	Flow > 2 gpm	1
Viron 3	Viron Scrubber 3	Pressure Drop Across Scrubber	Pressure Drop (0.5-12"WC)	4

Potential Deviations for **July 1, 2019 to September 30, 2019** reporting in accordance with the following instructions.

Please note that the Elyria site recently entered into a consent agreement with EPA Region V that requires it to convert its additional operations management software into a real-time environmental monitoring and recordkeeping system. As part of this transition, the site has begun to gather and review data that reflects certain Title V permit parameters, but because the transition is not yet complete, the site cannot yet determine whether any deviations recorded in this system reflect violations of permit terms or are attributable to some other cause. Until the new system is in place, EPA Region V advised us to submit this information as follows:

"Under its Title V permit BASF must report violations, which means determining whether indicated potential violations are actual violations. EPA's acceptance of BASF's proposed Environmental Management System (EMS) to resolve BASF's ongoing compliance issues through the Administrative Consent Order (ACO) in this matter requires this functionality. See ACO, paragraph 44. BASF has up to 12 months from the ACO's effective date to demonstrate compliance with the CAA and relevant permits. Ibid. Until BASF's EMS has this functionality, BASF should therefore continue to base its Title V reports on the observations and paper records required by the Title V permit. But in the interim, BASF should also include and appropriately label in its Title V reports potential deviations appearing in the Wonderware data."

Pursuant to EPA's instructions, we are basing our Title V reports on the paper records required by the Title V permit, but we are also including deviations reflected in the Wonderware data, labeled as "potential deviations."

Unit ID	Source	Air Pollution Control Device	Monitoring Requirements	Deviations
P006	Copper Calciner 1 (E-10)	Main Draft Dust Collector	Pressure drop (0.1-5" WC)	9
P010	Rotary Calciner #1 (E-14)	Dust Collector #1	Baghouse Pressure drop (0.1-5"WC)	1
P010	Rotary Calciner #1 (E-14)	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	7
P018	Wyssmont Drier (E-22)	Baghouse	Baghouse pressure drop (2-7"WC)	1
P070	CU/CR Strike Tanks (E-77)	Dust collector	Pressure drop (0.1-5"WC)	13
P080	Rotary Calciner #5 (E-13)	Dust Collector 5A	Pressure drop (0.1-5"WC)	25
P092	Rotary Calciner #6	Dust Collector #6	Pressure drop (0.1-5"WC)	5
P092	Rotary Calciner #6	Sly Scrubber	Flow > 2 gpm AND Demister Pressure Drop (0.05-1"WC)	23
P095	Copper Calciner #2 (E-101)	Main Draft Dust Collector	Baghouse Pressure Drop (0.1-6"WC)	1
P095	Copper Calciner #2 (E-101)	Feed Hopper Dust Collector	Baghouse Pressure Drop (0.1-6"WC)	1
P095	Copper Calciner #2 (E-101)	Discharge Dust Collector	Baghouse Pressure Drop (0.1-6"WC)	1
P099	PK Blender #2 (E-103)	Bldg. 9 Dust Collector	Baghouse Pressure drop (0.1-5"WC)	1
P102	Rotary Calciner #2	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	7
P103	Rotary Calciner #3	Dust Collector #3	Baghouse Pressure drop (0.1-5"WC)	1
P103	Rotary Calciner #3	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	7
P122	P&S Dryer #3	Dust Collector #3	Baghouse pressure drop (0.1-5"WC)	2
P130	#6 P&S Dryer	Sly Scrubber	Flow > 2 gpm AND Demister Pressure Drop (0.05-1"WC)	30
TriMer	Trimer Scrubber	Trimer Stage #2 Recirculation Flow	Flow >50 gpm	1

TriMer	Trimer Scrubber	Trimer Stage #3 Recirculation Flow	Flow >50 gpm	1
Viron 2	Viron Scrubber 2	Pressure Drop Across Scrubber	Pressure Drop Across Scrubber (0.5-12"WC), Scrubber Pump Flow, east and west (flow>2 gpm)	11
Viron 3	Viron Scrubber 3	Pressure Drop Across Scrubber	Pressure Drop Across Scrubber (0.5-12"WC), Scrubber Pump Flow, east and west (flow>2 gpm)	7

Potential Deviations for **October 1, 2019 to December 31, 2019** reporting in accordance with the following instructions.

Please note that the Elyria site recently entered into a consent agreement with EPA Region V that requires it to convert its additional operations management software into a real-time environmental monitoring and recordkeeping system. As part of this transition, the site has begun to gather and review data that reflects certain Title V permit parameters, but because the transition is not yet complete, the site cannot yet determine whether any deviations recorded in this system reflect violations of permit terms or are attributable to some other cause. Until the new system is in place, EPA Region V advised us to submit this information as follows:

"Under its Title V permit BASF must report violations, which means determining whether indicated potential violations are actual violations. EPA's acceptance of BASF's proposed Environmental Management System (EMS) to resolve BASF's ongoing compliance issues through the Administrative Consent Order (ACO) in this matter requires this functionality. See ACO, paragraph 44. BASF has up to 12 months from the ACO's effective date to demonstrate compliance with the CAA and relevant permits. Ibid. Until BASF's EMS has this functionality, BASF should therefore continue to base its Title V reports on the observations and paper records required by the Title V permit. But in the interim, BASF should also include and appropriately label in its Title V reports potential deviations appearing in the Wonderware data."

Pursuant to EPA's instructions, we are basing our Title V reports on the paper records required by the Title V permit, but we are also including deviations reflected in the Wonderware data, labeled as "potential deviations."

Unit ID	Source	Air Pollution Control Device	Monitoring Requirements	Potential Deviations
P006	Copper Calciner 1 (E-10)	Main Draft Dust Collector	Pressure drop (0.1-5" WC)	14
P006	Copper Calciner 1 (E-10)	Packaging Dust Collector	Pressure drop (0.1-5" WC)	5
P010	Rotary Calciner #1 (E-14)	Dust Collector #1	Baghouse Pressure drop (0.1-5"WC)	12
P010	Rotary Calciner #1 (E-14)	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	7
P018	Wyssmont Drier (E-22)	Baghouse	Baghouse pressure drop (2-7"WC)	4
P026	Double Cone Blender B-1&2 (E-30)	Dust Collector #8	Baghouse Pressure drop (0.1-5"WC)	4
P070	CU/CR Strike Tanks (E-77)	Dust collector	Pressure drop (0.1-5"WC)	23
P080	Rotary Calciner #5 (E-13)	Dust Collector 5A	Pressure drop (0.1-5"WC)	22
P086	Gen Cat P&S Dryer #1	Dust Collector #1	Pressure drop (0.1-5"WC)	12
P092	Rotary Calciner #6	Sly Scrubber	Flow > 2 gpm AND Demister Pressure Drop (0.05-1"WC)	99
P099	PK Blender #2 (E-103)	Bldg. 9 Dust Collector	Baghouse Pressure drop (0.1-5"WC)	1
P102	Rotary Calciner #2	Dust Collector #2	Baghouse Pressure drop (0.1-5"WC)	1
P102	Rotary Calciner #2	Dust Collector #8	Baghouse Pressure drop (0.1-5"WC)	4
P102	Rotary Calciner #2	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	7
P103	Rotary Calciner #3	Dust Collector #3	Baghouse Pressure drop (0.1-5"WC)	1
P103	Rotary Calciner #3	Dust Collector #8	Baghouse Pressure drop (0.1-5"WC)	4
P103	Rotary Calciner #3	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	7

P106	National Dryer	National Dust Collector	Baghouse Pressure drop (0.1-5"WC)	24
P121	P&S Dryer #2	Dust Collector #2	Baghouse pressure drop (0.1-5"WC)	1
P122	P&S Dryer #3	Dust Collector #3	Baghouse pressure drop (0.1-5"WC)	1
P130	#6 P&S Dryer	Sly Scrubber	Flow > 2 gpm AND Demister Pressure Drop (0.05-1"WC)	23
TriMer	Trimer Scrubber	TriMer 1st Stage Pressure Drop	Pressure Drop (0.05-3"WC)	7
TriMer	Trimer Scrubber	TriMer 3rd Stage Pressure Drop	Pressure Drop (0.2-6"WC)	2
TriMer	Trimer Scrubber	Trimer Stage #1 Recirculation Flow	Flow >50 gpm	1
TriMer	Trimer Scrubber	Trimer Stage #2 Recirculation Flow	Flow >50 gpm	1
TriMer	Trimer Scrubber	Trimer Stage #3 Recirculation Flow	Flow >50 gpm	6
TriMer	Trimer Scrubber	Trimer Stage #1 pH	pH >9	2
Viron 2	Viron Scrubber 2	Pressure Drop Across Scrubber	Pressure Drop Across Scrubber (0.5-12"WC), Scrubber Pump Flow, east and west (flow>2 gpm)	1
Viron 3	Viron Scrubber 3	Pressure Drop Across Scrubber	Pressure Drop Across Scrubber (0.5-12"WC), Scrubber Pump Flow, east and west (flow>2 gpm)	6

Nancy Gallagher

From: Leon Zavodnik
Sent: Wednesday, April 29, 2020 6:26 PM
To: Nancy Gallagher
Cc: Kathy Milstid Fisette
Subject: FW: Ohio EPA eBusiness Center - Data Submission Notification

Submitted

LEON ZAVODNIK
Operations Manager - Elyria

Phone: +1 440 329-2592, Mobile: +1-440-821-6647, Email: leon.zavodnik@basf.com Postal Address: BASF Corporation, , 120 Pine Street, 44035 ELYRIA, United States

ONE TEAM

-----Original Message-----
From: ebiz@epa.ohio.gov <ebiz@epa.ohio.gov>
Sent: Wednesday, April 29, 2020 6:23 PM
To: Leon Zavodnik <leon.zavodnik@basf.com>
Subject: Ohio EPA eBusiness Center - Data Submission Notification

A/An Compliance: TV Annual Certification for DAPC facility ID 0247040195 (system # 202700) was successfully submitted through Air Services.

Data submission PS:0247040195:1492121:0 for service DAPC was successfully received by Ohio EPA eBusiness Center on 04/29/2020 18:23:09 from the following account:

eBusiness Center Account: zavodnl
Leon Zavodnik (title: Operations Manager)
120 Pine Street
Elyria, OH 44035
(440) 329-2592

If you did not submit this transaction please contact Ohio EPA Customer Support.

If you would like to view your previous submissions please follow these steps:
1) Logon to the eBusiness Center.
2) Select 'View Submissions' from the 'My Account' menu.
3) Enter any search criteria (i.e. date range, service name, status, etc.) and click the 'Search' button.
4) From the resulting list click 'view' in the action column of the submission you wish to view.
5) Next, enter your PIN and the answer to the given security question to view the selected submission data.

If you need assistance or have questions about Ohio EPA's eBusiness Center, please call our technical support at (877) 372-2499 (1-877-EPA-BIZZ) or send an e-mail to ebizhelpdesk@epa.ohio.gov. Technical support hours of operation are 8:00 AM - 5:00 PM weekdays, except State holidays.

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(PROD-B39600-ProdServer4) DAPC-1428531